

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO: 22-20059

v.

HON. MARK A. GOLDSMITH

D-5 WILLIAM JOHNSON,

Defendant.

/

**GOVERNMENT'S COMBINED RESPONSE AND BRIEF IN RESPONSE  
TO DEFENDANT'S MOTION TO AMEND CONDITION OF BOND (ECF  
NO. 132)**

Defendant William Johnson was an integral member of large heroin and fentanyl conspiracy that operated in the Eastern District of Michigan and elsewhere, including Ohio. On February 8, 2022, a grand jury in this district returned an indictment against Defendant Johnson and 12 of his co-conspirators. (ECF No. 14). The indictment charged Johnson with: (Count 1) conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, (Counts 10 and 11) possession with intent to distribute controlled substances, in violation of 21 U.S.C. 841(a)(1), and (Count 12) possession of a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c). (*Id.*).

On March 7, 2022, United States Magistrate Judge Elizabeth A. Stafford arraigned Johnson on the Indictment and released him on bond. The United States did not contest Mr. Johnson's pretrial release. However, among other conditions, Magistrate Judge Stafford restricted Johnson's travel to the Eastern District of Michigan (EDMI) unless the Pretrial Services (PTS), Johnson's supervising officer or the Court consents. (ECF No. 62). Johnson now seeks to amend the travel restriction so that he can coach youth sports teams who have qualified for tournaments outside the Eastern District of Michigan. (ECF No. 132, Pg.ID 282).

From a technical point of view, Johnson need not petition the Court to amend travel conditions. He is already permitted to travel outside the EDMI so long as he first obtains consent from his Pretrial Services Officer, Gwen Stein. However, it is the government's understanding that Ms. Stein denied Johnson's latest request, in part, because Johnson has repeatedly requested permission to travel at the last minute leaving Ms. Stein to scramble to verify the purpose of the travel and timely adjudicate Johnson's request.

The United States leaves the Defendant's motion to amend conditions of release in this Honorable Court's discretion. Should the Court grant Defendant Johnson's motion, the United States respectfully requests that Johnson (1) request approval from the Court or PTS no less than 7 days prior to the travel, and (2) at the time of the request, provide the Court or PTS with documentary proof of the

purpose of the travel.

Respectfully Submitted,

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s/ Timothy P. McDonald  
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Dated: August 3, 2022

## CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, August 03, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

s/ *Timothy P. McDonald*  
Timothy P. McDonald  
Assistant United States Attorney